

**IN THE UNITED STATE DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

BASSAM NABULSI and §
RIMA NABULSI, §
Plaintiffs, §

V. §

H.H. SHEIKH ISSA BIN ZAYED AL §
NAHYAN, H.H. SHEIKH NASSER BIN §
ZAYED AL NAHYAN, H.H. SHEIKH §
SAIF BIN ZAYED AL NAHYAN, H.H. §
SHEIKH ADBULLAH BIN ZAYED AL §
NAHYAN, H.H. SHEIKH MOHAMMED §
BIN ZAYED AL NAHYAN, and THE §
PARTNERSHIP OF THE ROYAL §
FAMILY BIN ZAYED AL NAHYAN, §
Defendants. §

**CIVIL ACTION NO. H-06-02683
(JURY TRIAL REQUESTED)**

**PLAINTIFFS' UNOPPOSED MOTION FOR THE
COURT TO SET A RULE 16 SCHEDULING CONFERENCE**

TO THE HONORABLE JUDGE OF SAID COURT:

COME NOW Plaintiffs BASSAM NABULSI and RIMA NABULSI, complaining of H.H. SHEIKH ISSA BIN ZAYED AL NAHYAN, and for cause of action respectfully show this Honorable Court the following:

A. NATURE OF THIS CASE

The Court has written extensively about this case and is no doubt familiar with it. This case involves a breach of a partnership agreement between Plaintiff Bassam Nabulsi and Defendant Sheikh Issa. The deal began to go bad when Nabulsi objected to Sheikh Issa's increasingly depraved conduct. Ultimately, Sheikh Issa had Nabulsi arrested and tortured, and Nabulsi was deported from the UAE. Nabulsi was able to escape with his life, and tapes of Sheikh Issa torturing others.

B. RECENT ACTIVITY

Since the last status report, Plaintiff has retained new counsel. Further, Plaintiff has amended his Complaint to set forth the systematic and continuous contacts that Sheikh Issa has had with Texas, to clarify that the partnership at issue began in Texas and, in part, was carried out in Texas, and to make clear that, at its heart, the case before this Court is a business dispute that went bad. Since the last report, Plaintiff has nonsuited without prejudice his claims against all Defendants other than his business partner, Sheikh Issa. And, notably, Plaintiff has spent more than \$30,000.00 to effect service upon Sheikh Issa in Dubai, UAE. Such service was in fact effected, and the return of service has been filed with the Court. Finally, Plaintiff has retained a legal expert in UAE law to provide testimony regarding procedural aspects of that law,¹ in the unlikely event that the methods of service are challenged.

C. REQUEST FOR SCHEDULING CONFERENCE

Plaintiff is mindful of this Court's continued patience as Plaintiff took almost two years to effect service upon the Defendant. However, now that service has been accomplished, Plaintiff respectfully submits that the procedural posture of the case is such that a scheduling conference is in order. Thus, after a sufficient time has passed for Defendant to file responsive pleadings, Plaintiff respectfully requests that this Honorable Court set a scheduling conference pursuant to Rule 16 of the Federal Rules of Civil Procedure, so that this case can proceed to the discovery phase.

¹ If necessary, Plaintiff's legal expert will describe in general the UAE legal system and the role of royalty in that system. He will also opine that the methods of service recently accomplished upon Defendant n in Dubai are in fact "prescribed" under UAE law.

Respectfully submitted,

THE BUZBEE LAW FIRM

By: /S/ Tony Buzbee

Anthony G. Buzbee
State Bar No. 24001820
Federal Bar No. 22679
The Buzbee Law Firm
1910 Ice & Cold Storage Bldg.
104 21st Street (Moody Avenue)
Galveston, Texas 77550
Phone: (409) 762-5393
Fax: (409) 762-0538
www.txattorneys.com

OF COUNSEL:

THE AZEM FIRM
Samer Al-Azem
State Bar #00793240
2703 Newman Street
Houston, Texas 77098
Phone: (713) 429-5319
Facsimile: (713) 528-7247

**ATTORNEY FOR PLAINTIFFS, BASSAM
NABULSI, AND HIS WIFE, RIMA NABULSI**